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Counsel for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

ALICIA HERNANDEZ et al., individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 3:18-cv-07354-WHA

**STATUS REPORT ON
SETTLEMENT FUND
DISTRIBUTION**

Pursuant to the Court's order granting final approval (Dkt. 292) and the Northern District of California's Procedural Guidance for Class Action Settlements, Plaintiffs submit this status update and interim post-distribution accounting.

Status of Distribution

The Court granted final approval of the settlement on behalf of 505 class members on October 12, 2020. Dkt. 292. Pursuant to that order and the settlement agreement, JND mailed economic damages checks and emotional distress checks to these class members on December 7, 2020. Declaration of Jennifer Keough at ¶ 10. Those original checks had a void date of April 6, 2021. Leading up to April 6, JND and Class Counsel worked together to contact class members who had not cashed their checks and reissue new checks where necessary. The last void date on any new check was June 2, 2021. As of today, 94.2% of class member payments have been cashed. *Id.* at ¶ 11-14. The following is a summary of the current status of the accounting of the distribution:

Total Settlement Fund:	\$18,500,000.00
Class Member Payments (Cashed):	\$12,800,046.52
Initial Attorney's Fees Paid:	\$2,262,500.00
Attorney's Expenses Paid:	\$327,500.00
Administration Costs Paid:	\$65,000.00
Current Settlement Fund Balance:	\$3,044,953.48
Remaining Attorney's Fees to Be Paid:	\$2,262,500.00
Pending Re-issue to Class Member Fayga Keats ¹ :	\$21,511.12
Payments to States' Unclaimed Property Funds:	\$760,942.36

JND has started the process of sending amounts of uncashed checks to state unclaimed property funds. This escheatment process involves a separate filing with each affected state (in this case,

¹ After JND initiated the process of transferring the remaining uncashed balance to the states' unclaimed property funds, class member Fayga Keats contacted JND requesting a re-issue of her economic damages and supplemental payments. At the parties' direction, JND will re-issue these payments to Ms. Keats with a shortened 14-day void date.

unclaimed funds will be paid to 33 states as well as Puerto Rico). JND expects to complete this process by July 31, 2021. Keough Decl. at ¶ 15.

Within seven days of JND completing the escheatment process, Plaintiffs will file a final accounting certifying that all funds have been properly distributed and requesting an order for JND to release the second half of Class Counsel's attorney's fee. Dkt. 292 at 14.

Interim Accounting Per the Procedural Guidelines

The following chart summarizes the distribution of settlement funds to date and other accounting information pursuant to the Northern District's post-distribution accounting guidelines.

Total Number of Class Members	510
Number of Opt-Out Requests Received	5
Percentage of Class Members Opting Out of Settlement	.98%
Number of Objections Received	0
Percentage of Class Members Objecting to Settlement	0.00%
Number of Class Members Participating in Settlement	505
Percentage of Class Members Participating in Settlement	99.02%
Total Number of Class Members (Including Opt-Outs) to Whom Notice Was Sent and Not Returned as Undeliverable	503
Total Settlement Fund	\$18,500,000
Approved Attorney's Fees	\$4,525,000
• Attorney's Fees Paid	\$2,262,500
Attorney's Fees as a Percentage of Settlement Fund	25.0%
Attorney's Fee Multiplier	1.2
Approved Attorney's Expenses	\$335,000
• Attorney's Expenses Paid ²	\$327,500
Total Administration Costs	\$65,000
Net Settlement Fund	\$13,582,500
Percentage of Net Settlement Fund Cashed	94.2%
Value of Payments Cashed (by Check or Wire)	\$12,792,820.35

² \$7,500 was returned to the net settlement fund. Dkt. 305.

Value of Checks Not Cashed	\$789,679.66
Number of Checks Not Cashed (not including supplemental checks)	41
Number of Payments Cashed (by Check or Wire)	807
Average Recovery Per Class Member	\$21,595.77
Median Recovery	\$14,443.73
Largest Amount Paid to a Class Member	\$123,735.66
Smallest Amount Paid to a Class Member	\$14,443.73
Total Number of Emotional Distress Claim Forms from Class Members	121
Percentage of Class Members Filing Claim for Emotional Distress	23.73%
Methods of Notice	U.S. Mail, settlement-specific website
Method of Payment to Class Members	Check or Wire
<ul style="list-style-type: none"> Total Number of Class Members Sent Payment 	511 (as some Class Members requested to have their payment split among co-borrowers)
Cy Pres Payment	N/A

Dated: June 28, 2021

Respectfully submitted,

/s/ Michael L. Schrag

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